## ORIGINAL



February 2, 2016

Chairman Doug Little Commissioner Bob Stump Commissioner Bob Burns Commissioner Tom Forese Commissioner Andy Tobin

Arizona Corporation Commission
Commissioners Wing
1200 W. Washington
Phoenix, Arizona 85007

Re: Docket No. T-01051B-15-0382

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## Dear Commissioners:

I write on behalf of Arizona Investment Council ("AIC") to support CenturyLink's filing to recover unreimbursed costs associated with relocating facilities as mandated by government entities. CenturyLink proposes to recover these costs through a surcharge imposed on all regulated telecommunications access lines of its customers.

AIC believes CenturyLink's proposal is both reasonable and similar to cost recovery methods utilized by other telecommunications companies and regulated utilities.

Moreover, since relocation of CenturyLink's facilities is mandated by government jurisdictions, these costs are unavoidable and typically not fully reimbursed by the entities requiring relocation. These unreimbursed costs can also vary greatly from year-to-year depending on the number and type of construction projects underway in communities on behalf of public convenience.

CenturyLink has also taken care in its proposal to ensure against potential over-recovery and is capping the level of the surcharge to moderate its impact on customers. Only those unreimbursed costs associated with mandated relocation orders would be included in the surcharge and any additional costs related to facility improvements, if undertaken, would be excluded.

I would also point-out that CenturyLink's access line offerings face a highly competitive environment, which requires the company to be vigilant about its costs as well as the prices it charges.

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Finally, it is important that Arizona communities continually invest in projects to improve pubic convenience and upgrade transportation corridors. It is equally important that companies, like CenturyLink, have an opportunity to recover those costs required to support these public projects.

I, therefore, urge the Commission to expeditiously authorize CenturyLink's Facilities Relocation Surcharge.

Very truly yours,

Gary M. Yaquinto President & CEO

cc:

Elijah Abinah

Wilfred M. Shand Jr.

ORIGINAL and 13 copies filed with Docket Control This 2<sup>nd</sup> day of February, 2016